

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA,  
et al

vs

ARAKI, Sadao, et al

SWORN DEPOSITION

Deponent: KUMAGAI, Juro

Having first duly sworn on oath on attached sheet, and in accordance with the procedure followed in my country, I hereby depose that I have answered Attorney KUSANO Hyeichiro's questions as follows:

1. Q. Do you know that on August 25-29, 1938, SATO, Chief of Press Section of the War Ministry, delivered a lecture at the Chief of Prefectural Police Conference in the Home Office?
  - A. Yes, I do. When conferences of Chiefs of Prefectural Police were held at the Home Office, people from various circles were often requested to give lectures on the current questions of importance. It is in accordance to this circumstance, I think, that Colonel SATO, Chief of Press Section of the War Ministry, was invited by the Police Bureau of the Home Office to give a lecture on the occasion of the said conference of Prefectural Police Chiefs concerning the actual state of the China affair, so that the police chiefs might be able to dispel the rumors running by making use of the information thus given.
2. Q. Did you prepare this document (Ex. 270/2235) yourself? If so, tell us how you prepared it, and especially how accurate the statement is.
  - A. I am no stenographer. However, during the session of the conference above referred to, two lectures, I believe, if I remember right, were given. These lectures did not necessarily agree with each other, it seems to me. After the lectures were given, I jotted down roughly about 100 pages, which, I am inclined to think, I arranged in about 50-60 pages.

Def. Doc. No. 3020 (cont.)

The fact is, Colonel SATO spoke very fast and I remember finding it extremely hard to take memos of what he said. The present document was not subjected to Mr. SATO's review, and so fearing that there may be something that may not exactly accord with his speeches, I attached at the beginning of the present document a note saying - "the responsibility for the wording of the document rests with the witness."

Such is the case as far as I remember of the time.

On this 22nd day of January, 1948  
at Tokyo.

Deponent: KUMAGAI, Juro (SEAL)

I hereby certify that the above signature and seal were affixed hereto in the presence of the witness.

On the same date.  
At the same place.

Questioner & Witness: KUSANO, Hyoichiro

#### OATH

In accordance with my conscience, I swear to tell the whole truth, withholding nothing and adding nothing.

KUMAGAI, Juro (SEAL)

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